

ELLEN F. ROSENBLUM
Attorney General
JESSICA SPOONER #105919
Assistant Attorney General
Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
Telephone: (503) 947-4700
Fax: (503) 947-4791
Email: Jessica.Spooner@doj.state.or.us

Attorneys for State Defendants Asay, Bristol, Balogun, Gates, Golden, Highberger, Hill, Hyde, Jones, Kelly, Long, Lynch, Nawaz, Oregon Dept. of Corrections, Plante, Prins, Sandlin, Smith, Summers, Thomas Wagner, Wallace, Warren, Wold

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

D.A.,

Plaintiff,

v.

STATE OF OREGON, JOSH HIGHBERGER,
BRANDON KELLY, CRAIG PRINS,
JEREMY WAGNER, NICK JONES,
JONATHAN HYDE, MIKE HILL, C/O
ACEY, NAUMANN NAWAZ, JEREMY
SUMMERS, C/O SMITH, TINA WOLD,
DONALD GOLDEN, NATHAN WARREN,
JASON SANDLIN, GARY LONG,
RICHARD WALLACE, KRISTINE GATES,
JAMES THOMAS, KRYSTA LYNCH,
THOMAS BRISTOL, MORIAM BALOGUN,
JERRY PLANTE, and JOHN AND JANE
DOES 1-20,

Defendants.

Case No. 6:22-cv-00311-YY

DECLARATION OF JESSICA SPOONER

I, Jessica Spooner, hereby declare:

1. I am an attorney licensed to practice law in the State of Oregon and admitted to practice before the United States District Court for the District of Oregon. I am employed as an Assistant Attorney General with the Oregon Department of Justice. I am currently assigned to represent Defendants Asay, Bristol, Balogun, Gates, Golden, Highberger, Hill, Hyde, Jones, Kelly,

Long, Lynch, Nawaz, Oregon Dept. of Corrections, Plante, Prins, Sandlin, Smith, Summers, Thomas Wagner, Wallace, Warren, Wold (collectively referred to as “State Defendants”) in the above-captioned case.

2. I make this declaration in support of State Defendants’ Unopposed Motion for Extension of Time and under penalty of perjury. I have personal knowledge of and am competent to testify to the facts herein.

3. The current deadline for discovery in this case is March 30, 2022. The current deadline for filing dispositive motions in this matter is April 14, 2023.

4. I have conferred with Plaintiff’s counsel on this extension of time request. The parties are in agreement with the proposed extension.

5. It is defense counsel’s understanding that Plaintiff’s counsel will be filing an amended complaint with some additional and new defendants who will need to go through the process of requesting defense from DOJ.

6. State Defendants respectfully request the deadline to complete discovery be extended up to and including July 28, 2023; and the deadline to file dispositive motions be extended to August 14, 2023

7. This request is made in good faith and not for the purposes of unnecessary delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 30, 2023.

s/ Jessica Spooner

JESSICA SPOONER

Assistant Attorney General

Oregon Department of Justice